Comment Analysis & Response

Comments were reviewed by the interdisciplinary team (ID team) to determine if issues or concerns were raised that demonstrated a clear cause-effect relationship and if remedies were suggested that would address the issue/concern. Issues raised by multiple parties are listed once.

Comment text is generally summarized or paraphrased into an issue / concern statement where possible. Only substantive comments were addressed. Substantive comments include: comments that address new scientific information or data that would have a bearing on the analysis; comments that identify errors in the analysis, assumptions, methodology, or conclusions; comments that address misinformation that could affect the outcome of analysis; comments that request clarification; or comments that identify a new alternative with a mix of allocations that differ from those under any of the proposed actions. Comments that were in general favor or against a proposed action, agree or disagree with Forest Service policy or decisions without justification or supporting information, do not pertain to the project, or that take the form of vague, open-ended questions or statements were not addressed.

Aquatic Resources			
What is the issue, recommended action, or project consideration?	**Was topic carried forward for analysis?**	**Where can I find more information?**	**Why was the issue not carried forward?**
Consider storage of roads over decommissioning unless direct sediment delivery from these legacy roads cannot be controlled through BMP's.	Yes	Issue was considered in the Roads Analysis. A copy of the Roads Analysis is available in the project file.	
Project should maintain its water delivery for downstream use for recreation, irrigation, and fisheries.	Yes	Water delivery and its effects on beneficial uses (recreation, irrigation, and fisheries) are discussed in the Aquatic Specialist Report (PF, AQUATICS-007).	
Map and provide information on impaired streams within the project area.	Yes	303(d)-listed streams are discussed in the Aquatic Specialist Report (PF, AQUATICS-007)	

		and the fisheries Biological Assessment-Evaluation (PF, AQUATICS-001).	
Design the project so there is no significant short- or long-term increase in sediment to bull trout habitat.	Yes	Issue is addressed by the aquatic design elements. The effect of sediment on bull trout habitat is analyzed in the fisheries Biological Assessment-Evaluation (PF, AQUATICS-002) and the Aquatics Specialist Report (PF, AQUATICS-002).	
Concerns over treatments in old growth and loss of large trees and impacts on loss of large wood to trout populations.	Yes	Issue is addressed by the aquatic design elements. Impacts to large wood recruitment potential is analyzed in the fisheries Biological Assessment-Evaluation (PF, AQUATICS-002) and the Aquatics Specialist Report (PF, AQUATICS-002).	
The Aquatic Conservation Strategy describes the need for treatments that meet the need of multiple habitat types and we encourage the Forest to look for ways to incorporate treatments that meet those needs. Utilization of gap cuts to promote early seral habitat in the reserves, treatments to diversify all areas of the reserve, and prescriptions that account for the full range of objectives that the ACS mandates should be considered.	Yes	Issue is addressed through project design and the project design elements.	
Conduct a full analysis on the impacts to water quantity and timing caused by roads and soils compacted by logging.		The effect of roads and logging on water yield and stream flow timing are analyzed in the following project file documents: AQUATICS-004 (WEPP results for harvest activities); -011	

		(ECA & water yield calculations); -012 (road/stream influence data); -019 (WEPP road results); -024 (detailed sediment assessment and WEPP model results); -025 (ECA and water yield summary). Findings are summarized in the Aquatic Specialist Report (PF, AQUATICS-007).	
Disclose the Bitterroot National Forest's record of compliance with state best management practices regarding stream sedimentation from ground-disturbing management activities		Federal (US Forest Service, National Forests in Montana) compliance with Montana state best management practices for 2018 is disclosed in PF, AQUATICS-029 and AQUATICS-030. Timber sales on the Bitterroot National Forest are incorporated in the Federal category in these reports.	
Climate and Carbon			
What is the issue, recommended action, or project consideration?	**Was topic carried forward for analysis?**	**Where can I find more information?**	**Why was the issue not carried forward?**
Disclose project effects to climate change and carbon sequestration as a result of vegetation treatments in the Mud Creek project.	Yes	See Climate Change and Carbon section in chapter 3 of EA.	
The IDT should performed in-depth research into the impact a much warmer climate will have on the Bitterroot Forest.	No		Forest-wide research is beyond the scope and scale of this project.

Fuels and Fire			
What is the issue, recommended action, or project consideration?	**Was topic carried forward for analysis?**	**Where can I find more information?**	**Why was the issue not carried forward?**
Logging and thinning should be accomplished prior to any understory or pile prescribed burning due to the current hazardous fuel conditions.	Yes	Refer to the Existing Condition and Desired Future Condition Crosswalk & Activity Cards. A suite of treatments may be applied dependent on the site specific existing conditions, desired future conditions and proximity to values. Conditions in certain areas will require a phased approach while in other areas applying prescribed fire may be the appropriate to meet the desired future conditions.	
Concerns over excessive amounts of unburned slash litter and unburned logs.	Yes	Issue is addressed through the Fuels design feature in the pertinent activity cards. Slash disposal will be accomplished through a combination of Fuels Management activities (Piling, Pile Burning, Prescribed Fire). Site specific slash treatment plans based on existing and desired future conditions of the area and coarse woody debris CWD requirements for soils and wildlife will be developed and incorporated into implementation plans. Proper slash disposal is essential in moderating potential fire behavior and ensuring treatment effectiveness (USFS-Science Basis for Forest Health Treatments), (Peterson 2007), (Peterson et al. 2005), (Stephens et al. 2012), (Strom and Fule 2007) (Omi and Martinson 2002, 2004, 2010), (Agee and Skinner 2005), (Graham 2004, 2007)	

		(Pollet and Omi 2002), (Fule et al. 2001), (Hudak et al, 2011), (Prichard et al. 2020).	
Concerns that USFS takes a suppression first approach to wildfires. This had led to current fuel loads and unhealthy stands.	No		The changes to vegetation, fuels and potential fire behavior from decades of fire suppression is addressed in the existing conditions description of the project area as well as the fire fuels effects analysis. Changes in fire policy nationally or at the forest level are outside of the scope of this project. A desired outcome of implementing activities proposed by this project is to increase the ability to utilize fire (wildfire or prescribed) on the landscape to maintain natural processes and landscape diversity. Improving the vegetation and fuel conditions within low severity fire regimes and reducing potential fire behavior within the WUI will reduce the potential risk for negative effects from wildfires on onsite and adjacent values. This will increase the decision space and management opportunities for future wildfires in the area.
Disagreement with WUI boundary being used for project.	No		The Wildland Urban Interface boundary for Ravalli County was defined by the Bitterroot Community Wildfire Protection Plan (DNRC, 2006). This boundary was established using a set distance from the forest boundary. Changing that boundary is outside the scope of this project. The official definition of Wildland Urban Interface was published in the Federal Register in 2001.

Fuel reduction treatments more than a few hundred feet away from homes have minimal effect as stand replacing wildfires are more dictated by extreme climatic conditions and wind.	No	Results of fire behavior modeling using existing vegetation and fuels conditions show that 53 percent of the project area would experience stand replacing fire without extreme climatic conditions or wind events. The effects of proposed treatment activities on potential fire behavior is documented in the fire/fuels effect analysis. There is also abundant scientific literature that shows the effectiveness of fuel treatments on reducing fire behavior. (Safford, 2009, Omi, 2010, Peterson, 2005, Stephens, 2012, Strom and Fule 2007; Peterson 2007; Omi and Martinson 2002 & 2004; Agee and Skinner 2005; Graham et al. 2004 & 2009; Pollet and Omi 2002; Fule et al. 2001; Hudak et al, 2011; Prichard et al. 2020)	The purpose and need of the project is not to change the susceptibility of structures from burning during a wildfire. There is a need to reduce crown fire hazard potential within the Wildland-Urban Interface, adjacent community protection zone and low severity fire regimes. Only completing fuel treatments around home will not meet those needs or the desired future conditions for the project area. It is well understood and supported that the immediate area surrounding a home and the characteristics of the building material are potentially the most critical elements in determining its survivability. We encourage homeowners to do their part in making their homes fire safe, however, hardening structures on private land is beyond the scope and scale of this project. While individual home-by-home treatments can help reduce the risk of loss of individual homes, relying solely on such treatments would forego strategic opportunities for reducing fire behavior and controlling fires within this wildland urban interface area prior to fire impacting structures. Additionally, reducing fire behavior and the potential for torching within the WUI will also reduce the potential for lofted firebrands which are also a principle ignition factor for structures. Highly ignitable homes can ignite during a wildland fire without a fire spreading near the

			structure. Firebrands that result in ignitions can originate from wildland fires that are a distance of 1 kilometer (0.6 miles) or more (Cohen 2000).
Concerns over logging, thinning, and road building exacerbating the severity of subsequent wildfires.	Yes	The effects of proposed treatment activities on potential fire behavior is documented in the fire/fuels effect analysis. There is also abundant scientific literature that shows the effectiveness of fuel treatments on reducing fire behavior. (Safford, 2009, Omi, 2010, Peterson, 2005, Stephens, 2012, Strom and Fule 2007; Peterson 2007; Omi and Martinson 2002 & 2004; Agee and Skinner 2005; Graham et al. 2004 & 2009; Pollet and Omi 2002; Fule et al. 2001; Hudak et al, 2011; Prichard et al. 2020)	
Disagrees with the data from the fire-history study performed by Arno (1976) on an extremely small portion of the Bitterroot Forest to the entire Forest.	No		Arno's research is site specific information available for replicating fire history and historical fire return intervals for the Bitterroot. It contains empirical data taken directly from the area where this project would occur. Tree ring data from the 1970s that shows historical fire return intervals is as applicable then as it is today since it puts a much longer timeline into context. Additionally, a comprehensive literature review conducted by the Fire Effects Information System (FEIS) of wildland fire interactions with ponderosa pine communities within the Northern Rockies shows similar results to Arno and found that low to moderate surface fire typically burned every 6-13 years. (Fryer, 2016). The mean fire free period(s) identified from

			Arno's West Fork study locations were used to articulate what fire's historical impact on vegetation and fuels would have been within the project area and how that departure has created the current conditions. We acknowledge that potions of the project area would have burned more or less frequently than the mean fire free period, as well as at varying intensities and this would have had different effects to the vegetation, fuels and landscape diversity.
NEPA			
What is the issue, recommended action, or project consideration?	**Was topic carried forward for analysis?**	**Where can I find more information?**	**Why was the issue not carried forward?**
Concerned over extent of public participation process after treatments on specific units are identified or if feedback will be on the public record.	No	See EA Appendix B for description of project implementation plan.	
Disagreement with using an EA which minimizes treatment specifics and due to project size, social consequences, effects to listed species, and variety of terrain.	No		Decision to document potential project impacts by an environmental assessment or an environmental impact statement are dictated by the significance of issues or presence of uncertainty (see 40 CFR § 1502 and 1508.27).

Disagrees with condition-based analysis. This process could be used to avoid detailed comments from a scoping letter that reveals planned treatments on specific units.	No		The intent of the project scoping is outlined in 40 CFR § 1501.7. Specifics on proposed action are documented in the environmental assessment and made available for comment during the EA comment period (36 CFR § 220.7).
Disclose treatments conducted in inventoried roadless areas and wilderness study areas.	No	See proposed action (EA, Chapter 2) for description and location of treatments.	
Concerns over mining activity impacts on habitat for birds and other wildlife.	No		No mining activities are proposed as part of this project.
A minimum road system would reduce road impacts to wildlife, water quality, water quantity and fisheries. Develop a purpose and need to conduct an economic analysis of decommissioning roads and improving existing roads to BMPs.	Yes	A risk : benefit analysis was conducted to determine proposed actions on existing and proposed construction specified roads and motorized trails. See EA Appendix E.	
Disclose maps of roads, drainages, unit boundaries with a key to what is being proposed for various units.	Yes	See EA Appendix C-1 and C-2 for project activity maps.	
Reach out to both private and the State of Montana forest landowners that lie within the proposed Mud Creek project. It would be beneficial for these other forest landowners if they could perhaps "dove-	Yes		While this project does not propose any treatments on non-USFS lands, the Bitterroot National Forest will continue to work with adjacent landowners and other agencies to notify them of proposed actions so that interested landowners can time their treatments accordingly.

tail" some proactive forest and fuels management contractor work at the same time the BRF is especially regarding WUI fuels mitigation work.			
Expand project area to include entire currently roaded area of Little West Fork Drainage and other drainages with road systems that are only partially included.	No		Areas adjacent to the project boundary in the Little West Fork drainage were previously treated by the School Point Ecoburn Project, the Soda Springs Wildlife Improvement Project, and the Lower West Fork Project.
Construct new roads to access stands that are not accessible both inside and outside of the WUI. Managing more acres will help pay for road improvements.	Yes	Proposed road construction (temporary and specified roads) took into account the need to access areas not currently accessible through the existing transportation network.	
The Ravalli County Board of Commissioners adopted the Ravalli County Natural Resource Use Policy in 2012. This policy outlines goals and objectives in specific areas. Review this policy and implement project goals and objectives that are supported.	Yes	We feel project proposed actions are in alignment with many goals and objectives of the Ravalli County Natural Resources Use Policy.	
Consider an alternative that does not include construction of new roads or trails.	Yes	See alternatives considered but not analyzed in detail in chapter 2 of EA.	

The project size and the presence of or potential for ESA-listed species such as Bull Trout, Lynx, Wolverine, and Grizzly call for an EIS, not an EA. Additional alternatives need developed along with a No Action alternative.	No		Project size and presence of ESA-listed species are not criteria for documenting project-related effects in an EIS (see 40 CFR § 1508.27). Issues identified during external and internal scoping that cannot be addressed through project design or design features will be used in alternative development.
Disclose all Bitterroot National Forest Plan requirements for logging/burning projects and explain how the Project complies.	Yes	See project design features in the EA, Appendix A, which describe how activities will meet all applicable legal requirements, including the forest plan.	
Solicit and disclose comments from State of Montana government agencies.	Yes	State of Montana agencies have been and will continue to be included on project mailing lists. All comments received are included as part of project file.	
Disclose the Bitterroot National Forest's record of compliance with its monitoring requirements as set forth in its Forest Plan.	No		Reporting of monitoring required by the Bitterroot National Forest Plan can be found here: https://www.fs.usda.gov/main/bitterroot/landmanagement/planning.
Invasive Plants			
What is the issue, recommended action, or project consideration?	**Was topic carried forward for analysis?**	**Where can I find more information?**	**Why was the issue not carried forward?**

Concerns over disturbance created by project activities and subsequent establishment and spread of invasive weeds.	Yes	Project design features and mitigation features were developed to address concerns of introduction and spread of invasive plants (see EA Appendix A).	
Rare Plants			
What is the issue, recommended action, or project consideration?	**Was topic carried forward for analysis?**	**Where can I find more information?**	**Why was the issue not carried forward?**
Disclose the results of the field surveys for threatened, endangered, sensitive, and rare plants in each of the proposed units.	No	Project area surveys conducted to date were used to disclose existing conditions in the rare plants BE. Surveys conducted prior to implementation will be incorporated as part of the project record to ensure project compliance with design features and mitigations.	
Recreation			
What is the issue, recommended action, or project consideration?	**Was topic carried forward for analysis?**	**Where can I find more information?**	**Why was the issue not carried forward?**
Concerns over road reduction. Connecting loops between drainages are desirable.	Yes	Proposed roads changes were informed by a risk : benefit analysis conducted by the IDT (see EA, Appendix E). Motorized trail map for proposed connecting loops.	

Maintain roads and trails for recreation opportunities and access.	Yes	See motorized trail map for existing and proposed trail changes (EA, Appendix C-1 and C-2).	
Provide opportunities for quiet use recreation that have limited impacts to resources and wildlife.	No		While the majority of project area is roaded, two inventoried roadless areas exist within the project area that do not provide for motorized recreation. There were not any proposals for non-motorized trails during public involvement. Motorized trail opportunities were already established during travel planning; approximately 3 miles of new construction will link 2 loops together.
Concerns over the safety and conflicts of the different recreation user groups using the same area.	No		The Forest Service manages for multiple-use. Motorized trails are managed for vehicles 50" or less. Non-motorized users are welcome on motorized trails.
Concerns over when and where ATV/UTV/snowmobile use is permitted and impacts to wildlife and habitat disturbance.	Yes	Refer to wildlife specialist report.	Motorized trail opportunities were already established during travel planning; approximately 3 miles of new construction will link 2 loops together. Open season of trails will adhere to wildlife dates of June 15 to provide security during elk calving season.
Silviculture and Timber			
What is the issue, recommended action, or project consideration?	**Was topic carried forward for analysis?**	**Where can I find more information?**	**Why was the issue not carried forward?**

Consider use of clearcuts on a small scale as they setback succession and allow for greater diversity to allow plants to grow.	Yes	The silvicultural methods proposed for use within the Mud Creek project can be found in the Proposed Action, the Vegetation Report, the Existing and Desired Conditions Crosswalk and the Activity cards.	
Conduct a thorough field inventory of old growth trees. Do not commercially log or add roads in these stands. Only do understory non-commercial thinning and/or prescribed burns.	Yes	Green et al. (1992) is the regional direction for assessing and determining old growth. Old growth is discussed in the silviculture specialist report (PF-SILV-001), and data collection methods for measuring old growth are found in the design features in the EA, Appendix A.	
Disagreement with the effects of thinning to reduce disease and insects. Allow for natural thinning by insects and disease.	No	The desired conditions, project purpose and need, and natural disturbance processes are addressed in the Vegetation Report.	Allowing insects and disease to naturally thin the forest does not meet the project purpose and need to improve landscape resilience to disturbances (such as insects, diseases, and fire) by modifying forest structure and composition, and fuels.
Concerns over ancient, old growth ponderosa pine located up the bottom of Soda Spring Creek. This stand is at extreme fire risk due to encroaching Douglas-fir fuels ladder.	Yes	Thank you for your location specific concern. Management of old growth for resiliency to disturbances such as fire are discussed in the old growth section of the Vegetation Report as well as in the Proposed Action.	
Concerns over the use of clearcuts as a treatment within the project area and the potential for stands to regenerate given climate change.	Yes	The issue is discussed in the Vegetation Report and Soils Report. Site conditions including soil water deficit and stand conditions are reviewed during the stand diagnosis in the implementation phase and used to help select the best type of treatment for the site. Analysis of past regeneration success has been conducted and can be found in the Regeneration Timeframes Report in the Appendix.	

DXP could be an effective tool in this project. Use the technique that establishes and determines the preferred end result of a harvest area and allow the purchaser the flexibility to propose alternative harvest and mechanical systems.	Yes	Designation by Description and Designation by Prescription, in addition to Individual Tree Marking, will be considered for this project. The best method will be chosen depending on the end results needed on the ground and the most cost-effective method to implement.	
Douglas-fir dwarf mistletoe cannot be completely eradicated, however, management in these stands should include removal of any infected tree. Any infected trees left should be girdled to prevent further spread but retain the wildlife quality these trees provide.	Yes	Dwarf mistletoe and management options to reach a desired condition are discussed in the Vegetation Report.	
Concerns over landscape resilience to disturbances such as insects, diseases, and fire. Modify forest structure and composition, and fuels. Use the same management strategy that is applied in the WUI.	Yes	Landscape scale and stand level resiliency to disturbances is discussed throughout the Vegetation Report. Metrics such as stand density, species composition and size-class diversity are used to measure resiliency.	
Recommend treatments and actions that align with Professor Larson's ICO approach to ecological restoration.	Yes	This issue is addressed in the Proposed Action and Vegetation Report. Group Tree and Individual Selection, SAF and FS approved silvicultural methods, will be used address Larson's ICO approach to retain individuals, clumps and openings specifically to manage for uneven-aged ponderosa pine stands. See Group	

		Tree and Individual Tree Selection Activity Card for details.	
Treatment design should be site-specific. Conduct a careful site-specific analysis before recommending treatment. Consider aspect, topography, microclimate, and existing old species diversity.	Yes	Stand diagnosis will be conducted and site-specific data will be reviewed by a Certified Silviculturist to determine the best course of action for each stand and how that stands fits into the greater landscape. See Vegetation Report and Implementation Plan.	
Disagrees with treating areas that historically had infrequent mixed and high severity fires, such as steep north-facing slopes and riparian areas.	No	The issue is addressed in the Vegetation Report. Historic disturbance data, natural fire return intervals, current stand conditions, departure from desired conditions habitat needs, and location are all factors in determining treatment needs on all aspects and elevations. Project design features and mitigation measures will ensure desired conditions are met. See Activity Cards for design features and Implementation Plan for the process in determining mitigation measures.	The project purpose and need is to improve landscape resilience to disturbance. All forest types, despite the natural fire regime, are experiencing the effects of fire suppression, insect and disease activity. To improve landscape resilience, it is important to select treatments that move the landscape toward the desired condition by creating a mosaic of age-class and structure diversity, and appropriate species composition and stand densities for site conditions. Avoiding management in forest types with mixed to high severity fire regimes does not meet the purpose and need at the landscape scale.
Soils			
What is the issue, recommended action, or project consideration?	**Was topic carried forward for analysis?**	**Where can I find more information?**	**Why was the issue not carried forward?**

Concerns over the detrimental soil disturbance caused by existing terraces and general soil compaction within the project area. Disclose detrimental soil disturbance levels and effects of any proposed treatments to terraces.	Yes	Detrimental soil disturbance and impacts from existing terrace features in the project area are discussed on page 9 of the Soil report. Soil quality (DSD) surveys were completed during project development to validate the Soil Risk Evaluation Framework (PF-SOILS-008). Additional surveys will occur prior to project implementation as described in the EA, Appendix B, Implementation Plan.	
Soil disturbance that accompanies commercial logging is significant in many areas of previous projects and has resulted in the replacement of the native ground cover with invasive weeds. Consider winter logging and non-commercial thinning.	Yes	Winter logging may occur as a site-specific design criterion based on pre-implementation reviews for proposed treatment areas. See EA, Appendix A for the design feature effectiveness discussion on Winter Logging and the Implementation Plan for information on the review process. Non-commercial thinning treatments are prescribed based on vegetative management objectives and are not always the appropriate tool meet the project's Purpose and Need. The decision-making process for specific implementation units is described in the EA, Appendix B, Implementation Process.	
Transportation			
What is the issue, recommended action, or project consideration?	**Was topic carried forward for analysis?**	**Where can I find more information?**	**Why was the issue not carried forward?**

Concerns over the impact of current roads, temporary roads and reconstruction of undetermined roads on fragmentation of habitat, stream sedimentation, water quality, weeds, and high cost of building and maintenance. Tailor management activities to use only existing roads. Perform BMPs on non-decommissioned roads.	Yes	See individual specialist reports for discussion on existing road infrastructure and proposed construction on impacts to respective resources.	
Concerns over high road density in the project area. Keep new road construction or reopening of undermined roads at an absolute minimum. Perform BMPs to all roads not planned for decommission or conversion to recreational trails. Convert some stable roads to recreation trails provided resource or wildlife concerns are low.	Yes	See chapter 2 of EA for proposed road changes including road storage and decommissioning, which was formed by risk : benefit analysis (see EA, Appendix E).	
Main access routes should be maintained for public and firefighter safety, removal of commercial products, and recreational opportunities. Provide alternative escape routes in case of a fire.	Yes	The risk : benefit analysis evaluated the need for public and firefighter safety when determining proposed actions on existing road segments (see EA, Appendix E).	
We would like the District to carefully consider the	Yes	Road decommissioning (and other proposed road changes) was informed by a risk : benefit	

following three factors when making a decision to decommission any road in the project area: • Determination of any potential resource risk related to a road segment • Determination of the access value provided by a road segment • Determination of whether the resource risk outweighs the access value (for timber management and other resource needs).		analysis conducted by the IDT (see EA, Appendix E).	
Disclose the current, during-project, and post-project road densities in the Project area.	Yes	Spatial and tabular data related to existing and proposed road and trail infrastructure is recorded in the Geographic Information System project file.	
Wilderness			
What is the issue, recommended action, or project consideration?	**Was topic carried forward for analysis?**	**Where can I find more information?**	**Why was the issue not carried forward?**
Concerns about the IRA's and Blue Joint WSA areas. Do not use mechanical treatment or	No	The issue is addressed in the proposed action.	The proposed action states that WSA's and IRA's are "Areas Where Commercial Treatments Will Not Occur". Additionally,

commercial treatment in these areas. Limit commercial logging to the CPZ and only in MA1.			Part of the purpose and need of the Mud Creek Project is to Improve landscape resilience to disturbances (such as fire, insects and diseases) by diversifying forest structure and composition and reducing fuels. Vegetation management activities that include commercial harvest will be used to help meet the purpose and need of the project. Management areas 1, 2 & 3A of the 1987 Bitterroot National Forest Land Resource Management Plan are found within the Mud Creek project area. Forest plan direction allows for commercial timber harvest to occur in each of these management areas to achieve resource goals. Proposed activities are consistent with Forest Plan direction for Management Areas 1, 2 & 3A. Priority for commercial treatments will be for areas within the Community Protection Zone.
In the Blue Joint WSA improve your ability to evaluate the projects relationship to wilderness, wildfire threat, wildlife habitat connectivity and security, water quality and motorized and non-motorized recreation. Update the wilderness assessment and incorporate the Blue Joint WSA into your analysis area.	No		Project activities will be analyzed by each resource including how prescribed fire effects natural/ecological processes. The Blue Joint WSA was included in the Roadless Analysis.
Leave WSA and IRAs alone or only do hand thinning. Use Blue Joint as a control to see	No	The issue is addressed in the proposed action.	The proposed action states that WSA's and IRA's are "Areas Where Commercial Treatments Will Not Occur"

how untreated areas compare to areas treated. The IRAs could be used as a control to assess the impact of roads.			
Increase vegetation management in the Inventoried Roadless Areas to benefit the watershed and reduce the severity of wildfires. Conduct timber harvesting in the Inventories Roadless Areas.	No		No commercial harvest will occur within the WSA or IRA. Only approximately 175 acres were identified as available for commercial harvest based on the existing road infrastructure and were not identified as high priority for treatment. Helicopter yarding is not an economically viable option for treating these remote lower priority areas. Non-commercial activities and prescribed fire are planned within the IRA to reduce potential wildfire severity, create landscape diversity and achieve desired conditions. Non-commercial activities are limited to the warm dry forest types found within the IRA (60 acres) that are the most departed from desired conditions.
Wildlife			
What is the issue, recommended action, or project consideration?	**Was topic carried forward for analysis?**	**Where can I find more information?**	**Why was the issue not carried forward?**
Disclose the biological assessment for the candidate, threatened, or endangered species with potential and/or actual habitat in the Project	Yes	Wildlife Specialist Report	

area as well as sensitive and management indicator species in the project area.			
Disclose the snag densities in the Project area, and the method used to determine those densities.	Yes	Wildlife Specialist Report/Design Features	
Concerns there are adverse effects to wildlife resources when suppression efforts near private lands begin with the structures and work outward. Thinning could be modified with clearing favorable to regeneration patches. Leave some large woody debris material on the ground for nutrient recycling and small mammals.	Yes	Issue is addressed through project design and the project design elements.	
Concerns over habitat fragmentation by roads and implications for climate change and connectivity.	Yes	Issue was considered in the risk : benefit analysis for existing and proposed roads and trails (see EA, Appendix E).	
Forest management may remove hiding / thermal cover for game species during the hunting season, but the resulting boost in understory forage production, especially if fire is reintroduced, should increase overwinter survival and recruitment of young. This may reduce the tendency of some herds, especially elk,	Yes	Wildlife Specialist Report	

to seek high quality forage on private croplands. Fire suppression, in part, has resulted in conifer expansion and dense understory growth on south-facing slopes and meadows. The bighorn sheep herd relies on large expanses of open, grassy slopes in the Little Blue Joint drainage for forage and predator avoidance. Forest management could restore open, grassy slopes and meadow habitat in nearby drainages, similar to what exists in the Little Blue Joint drainage.			
Eliminate (by obliterating or storing) many of the redundant roads and road spurs along the lower and higher elevation contours. Additionally, use caution in proposing new permanent motorized and non-motorized roads, loops and/or trails by weighing possible impacts to wildlife and fisheries resources and habitat.	Yes	Issue was considered in the Roads Analysis. A copy of the Roads Analysis is available in the project file. Issue is addressed through project design and the project design elements.	
Maintain a mosaic of habitat types across the landscape to benefit a wide variety of wildlife species across seral	Yes	Issue is addressed through project design and the project design elements.	

stages and to provide natural barriers to catastrophic events, such as stand-replacing fires and diseases / insect outbreaks.			
Many of the areas in the project are choked by small unhealthy trees. These unhealthy stands are not good elk habitat. Open up these stands to promote grasses and low-lying vegetation	Yes	Issue is addressed through project design and the project design elements.	